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September 19, 2022

REF: **8328.01**

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VIA ECF

Honorable Raymond J. Dearie
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Milan Heggs et al. v. The City of New York et al.,
17-CV-3234 (RJD)(TAM)

Your Honor:

I am a partner at Beldock Levine & Hoffman LLP, one of the counsel for Plaintiffs in the above-referenced action. Plaintiffs' motion for class certification and accompanying papers have been submitted to Defendants. This includes the notice of motion; memorandum of law in support of the motion; a declaration by David B. Rankin; an affirmation by Timothy A. Clune of Disability Advocates, Inc.; affirmations by Kathleen M. Collins and Jean Ryan of Disabled In Action; a declaration by Michael L. Spiegel; and accompanying exhibits.

Additionally, Plaintiffs request the Court's permission to file a memorandum of law in support of their motion for class certification of 35 pages. The basis for this request include the breadth of factual issues presented, facts developed in discovery, and the complexity of the legal issues. Defendants do not consent to this request. Should the request for additional pages be

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denied, we respectfully request an additional 48 hours from the order to submit a 25-page brief. Defendants consent to Plaintiffs having an additional two days to submit a 25-page brief.

We thank Your Honor for considering this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'David B. Rankin', with a stylized, sweeping flourish extending to the right.

David B. Rankin

CC: Mark Toews; Ellen Mulqueen; Rachel Marcoccia